

**JOSEPH SAVERI LAW FIRM, INC.**

Joseph R. Saveri (admitted *pro hac vice*)  
Joshua P. Davis (admitted *pro hac vice*)  
Matthew S. Weiler (admitted *pro hac vice*)  
Kevin E. Rayhill (admitted *pro hac vice*)  
555 Montgomery Street, Suite 1210  
San Francisco, California 94111  
Phone: (415) 500-6800/Fax: (415) 395-9940  
jsaveri@saverilawfirm.com  
jdavis@saverilawfirm.com  
mweiler@saverilawfirm.com  
krayhill@saverilawfirm.com

*Co-Lead Counsel for the Classes and  
Attorneys for Individual and Representative Plaintiffs  
Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez,  
Brandon Vera, and Kyle Kingsbury*

[Additional counsel appear on signature page]

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

Cung Le, Nathan Quarry, Jon Fitch, Brandon  
Vera, Luis Javier Vazquez, and Kyle  
Kingsbury on behalf of themselves and all  
others similarly situated,

Plaintiffs,

vs.

Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045 RFB-(PAL)

**PLAINTIFFS' MOTION TO LODGE  
MATERIALS UNDER SEAL**

1  
2  
3 Pursuant to Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Local Rule 10-5(b),  
4 and Section 14.3 of the Revised Stipulation and Protective Order issued by this Court on February  
5 10, 2016 (ECF No. 217 at 15), Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis  
6 Javier Vazquez, and Kyle Kingsbury on behalf of themselves and all others similarly situated  
7 (collectively, "Plaintiffs") hereby move this Court for leave to lodge certain documents under seal  
8 related to their motion to challenge Defendant's assertion of work product protection over three  
9 certain documents.

10 Plaintiffs request leave to lodge certain documents under seal. First, Plaintiffs seek leave to  
11 lodge under seal Plaintiffs' Motion To Challenge Work Product Designation.

12 Second, Plaintiffs seek leave to lodge under seal Exhibit 1 to the Declaration of Kevin E.  
13 Rayhill In Support Of Plaintiffs' Motion To Challenge Work Product Designation (the "Rayhill  
14 Declaration"), which is an unredacted version of a document with the Bates number ZFL-1824837,  
15 an attachment to the email consisting of a memorandum drafted by the third party human resources  
16 consulting firm requesting documents, that Defendant has clawed back as protected under the work  
17 product doctrine.

18 Third, Plaintiffs seek leave to lodge under seal Exhibit 2 to the Rayhill Declaration, which is  
19 an unredacted version of a document with the Bates number ZFL-1824835, an email between  
20 Zuffa's in-house counsel and outside counsel scheduling a phone call.

21 Fourth, Plaintiffs seek leave to lodge under seal Exhibit 3 to the Rayhill Declaration, which is  
22 an unredacted version of a document with the Bates number ZFL-0557588, a presentation prepared  
23 by a third party human resources consulting firm commissioned by Defendant.

24 Exhibits 1, 2 and 3 are the three documents at issue in Plaintiffs' motion to challenge.

25 Fifth, Plaintiffs seek leave to lodge under seal Exhibit 5 to the Rayhill Declaration which is a  
26 document with the Bates stamp ZFL-1007379, consisting of a letter dated August 8, 2013 from the  
27 third party human resources consulting firm to Lorenzo Fertitta with the subject line "Statement of  
28 Work ("SOW") - Fighter Pay Program Review and Design."

Sixth, Plaintiffs seek leave to lodge under seal Exhibit 7 to the Rayhill Declaration which is an unredacted copy of Plaintiffs Notice of Deposition of Defendant Zuffa, LLC Pursuant to Federal Rule of Civil Procedure 30(b)(6), which contains a reference to the content of ZFL-1007379, the Mercer Statement Of Work (Ex. 5), which has been designated CONFIDENTIAL by Defendant.

Seventh, Plaintiffs seek leave to lodge under seal Exhibit 9 to the Rayhill Declaration which is an unredacted copy of Plaintiffs' Second Requests For Production of Documents, which contain a reference to the content of ZFL-1007379, the Mercer Statement Of Work (Ex. 5), which has been designated CONFIDENTIAL by Defendant.

Plaintiffs have filed all of these documents, in accordance with the Court's ECF system, with the instant motion. Plaintiffs have filed placeholders for these documents with the Court, and will serve un-redacted versions of these documents on Defendant.

DATED this 31st day of August, 2016

**JOSEPH SAVERI LAW FIRM, INC.**

By: /s/ Joseph R. Saveri

Joseph R. Saveri (admitted *pro hac vice*)  
 Joshua P. Davis (admitted *pro hac vice*)  
 Matthew S. Weiler (admitted *pro hac vice*)  
 Kevin E. Rayhill (admitted *pro hac vice*)  
 555 Montgomery Street, Suite 1210  
 San Francisco, California 94111  
 Phone: (415) 500-6800/Fax: (415) 395-9940  
 jsaveri@saverilawfirm.com  
 jdavis@saverilawfirm.com  
 mweiler@saverilawfirm.com  
 krayhill@saverilawfirm.com

*Co-Lead Counsel for the Classes and Attorneys for  
 Individual and Representative Plaintiffs Cung Le,  
 Nathan Quarry, Jon Fitch, Luis Javier Vazquez,  
 Brandon Vera, and Kyle Kingsbury*

**COHEN MILSTEIN SELLERS & TOLL,  
PLLC**

Benjamin D. Brown (admitted *pro hac vice*)  
Richard A. Koffman (admitted *pro hac vice*)  
Hiba Hafiz (admitted *pro hac vice*)  
1100 New York Ave., N.W., Suite 500, East  
Tower Washington, DC 20005  
Phone: (202) 408-4600/Fax: (202) 408 4699  
bbrown@cohenmilstein.com  
rkoffman@cohenmilstein.com  
hhafiz@cohenmilstein.com

*Co-Lead Counsel for the Classes and Attorneys for  
Individual and Representative Plaintiffs Cung Le,  
Nathan Quarry, Jon Fitch, Luis Javier Vazquez,  
Brandon Vera, and Kyle Kingsbury*

**BERGER & MONTAGUE, P.C.**

Eric L. Cramer (admitted *pro hac vice*)  
Michael Dell'Angelo (admitted *pro hac vice*)  
1622 Locust Street  
Philadelphia, PA 19103  
Phone: (215) 875-3000/Fax: (215) 875-4604  
ecramer@bm.net  
mdellangelo@bm.net

*Co-Lead Counsel for the Classes and Attorneys for  
Individual and Representative Plaintiffs Cung Le,  
Nathan Quarry, Jon Fitch, Luis Javier Vazquez,  
Brandon Vera, and Kyle Kingsbury*

1 **WOLF, RIFKIN, SHAPIRO,**  
2 **SCHULMAN & RABKIN, LLP**  
3 Don Springmeyer  
4 Nevada Bar No. 1021  
5 Bradley S. Schrager  
6 Nevada Bar No. 10217  
7 Justin C. Jones  
8 Nevada Bar No. 8519  
9 3556 E. Russell Road, Second Floor  
10 Las Vegas, Nevada 89120  
11 (702) 341-5200/Fax: (702) 341-5300  
12 dspringmeyer@wrslawyers.com  
13 bschrager@wrslawyers.com  
14 jjones@wrslawyers.com

15 *Liaison Counsel for the Classes and Attorneys for*  
16 *Individual and Representative Plaintiffs Cung Le,*  
17 *Nathan Quarry, Jon Fitch, Luis Javier Vazquez,*  
18 *Brandon Vera, and Kyle Kingsbury*

19 **WARNER ANGLE HALLAM JACKSON &**  
20 **FORMANEK PLC**

21 Robert C. Maysey (admitted *pro hac vice*)  
22 Jerome K. Elwell (admitted *pro hac vice*)  
23 2555 E. Camelback Road, Suite 800  
24 Phoenix, AZ 85016  
25 Phone: (602) 264-7101/Fax: (602) 234-0419  
26 rmaysey@warnerangle.com  
27 jelwell@warnerangle.com

28 *Counsel for the Classes and Attorneys for*  
*Individual and Representative Plaintiffs Cung Le,*  
*Nathan Quarry, Jon Fitch, Luis Javier Vazquez,*  
*Brandon Vera, and Kyle Kingsbury*

**LAW OFFICE OF FREDERICK S.**  
**SCHWARTZ**

Frederick S. Schwartz (admitted *pro hac vice*)  
15303 Ventura Boulevard, #1040  
Sherman Oaks, CA 91403  
Phone: (818) 986-2407/Fax: (818) 995-4124  
fred@fredschwartzlaw.com

*Attorneys for Plaintiffs*

**SPECTOR ROSEMAN KODROFF &  
WILLIS, P.C.**

Jeffrey J. Corrigan (admitted *pro hac vice*)

William G. Caldes (admitted *pro hac vice*)

1818 Market Street – Suite 2500

Philadelphia, PA 19103

Phone: (215) 496-0300/Fax: (215) 496-6611

jcorrigan@srkw-law.com

wcaldes@srkw-law.com

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 31st day of August, 2016 a true and correct copy of  
**PLAINTIFFS' MOTION TO LODGE MATERIALS UNDER SEAL** was served via the  
United States District Court CM/ECF system on all parties or persons requiring notice.

By: /s/ Kevin E. Rayhill